

Ernest Ukaj
Chairman of the Board of Directors
Money Key AG
Industriestrasse 28
CH-9100 Herisau, Switzerland

Ernest Ukaj has knowledge surrounding of the formation and growth of DAAG; DAAG's unique business plan; the licensure pursued and obtained by DAAG; the tech stack employed by DAAG; DAAG's relationship with various crucial regulators; and the value of DAAG at or around the time of the disputed transfers.

Sam Bankman-Fried
Metropolitan Detention Center
80 29th St.
Brooklyn, NY 11232

Sam Bankman-Fried has knowledge of the fraudulent schemes in which he conspired at FTX and their inapplicability to DAAG; FTX's general business operations and plans; FTX's finances and solvency; FTX's intention with respect to the investment in and acquisition of DAAG and a similarly situated company, Ledger X; information surrounding the initiation of DAAG's relationship with FTX; DAAG's unique business plan; the licensure pursued and obtained by DAAG; the tech stack employed by DAAG; DAAG's relationship with various crucial regulators; the value of DAAG at the time of the disputed transfers; the negotiations and consummation of the disputed transactions; the value of DAAG to FTX; other offers and interest that third parties had in DAAG; and the success of DAAG after its acquisition by FTX.

Ryan Salame
c/o Jason Linder
Mayer Brown LLP
333 S. Grand Avenue, Ste 47th Floor
Los Angeles, CA 90071

Ryan Salame has knowledge of the fraudulent schemes in which he conspired at FTX and their inapplicability to DAAG; FTX's general business operations and plans; FTX's finances and solvency; FTX's intention with respect to the investment in and acquisition of DAAG and a similarly situated company, Ledger X; information surrounding the initiation of DAAG's relationship with FTX; DAAG's unique business plan; the licensure pursued and obtained by DAAG; the tech stack employed by DAAG; DAAG's relationship with various crucial regulators; the value of DAAG at the time of the disputed transfers; the negotiations and consummation of the disputed transactions; the value of DAAG to FTX; other offers and interest that third parties had in DAAG; and the success of DAAG after its acquisition by FTX.

Nishad Singh
c/o Russell Capone
Cooley LLP
55 Hudson Yards
New York, NY 10001

Nishad Singh has knowledge of the fraudulent schemes perpetrated by FTX and their inapplicability to DAAG. Nishad Singh also oversaw operations at FTX Europe post acquisition of DAAG and has knowledge of the value that the DAAG acquisition brought to FTX.

Gary Wang
c/o Ilan Tuviah Graff
Fried, Frank, Harris, Shriver & Jacobson LLP
One New York Plaza
New York, NY 10004

Gary Wang has knowledge of the fraudulent schemes perpetrated by FTX and their inapplicability to DAAG and the solvency of FTX at the time of the disputed transfers.

Caroline Ellison
c/o Stephanie Avakian
Wilmer Cutler Pickering Hale and Dorr LLP
2100 Pennsylvania Avenue NW
Washington, DC 20037

Caroline Ellison has knowledge of the fraudulent schemes perpetrated by FTX and their inapplicability to DAAG and the solvency of FTX at the time of the disputed transfers.

Daniel Friedberg
1133 Bigelow Avenue North
Seattle, WA 98109

Daniel Friedberg, a former attorney with Fenwick & West LLP, (which represented FTX and Alameda) served as counsel for FTX and was involved in the negotiations between FTX and DAAG with respect to the investment in and ultimate acquisition of DAAG. Daniel Friedberg also ran point on the due diligence that FTX conducted in connection with its investment in and acquisition of DAAG.

Can Sun
FTX Trading Ltd.
27 Veridian Corporate Center
New Providence, Bahama Islands

Can Sun, a former Corporate Associate and Blockchain Industry Co-chair at Fenwick & West, LLP, served as counsel for FTX and was involved in the negotiations between FTX and DAAG with respect to the investment in and ultimate acquisition of DAAG. Can Sun had significant involvement in the due diligence conducted by FTX for the ultimate acquisition of DAAG. Can Sun also oversaw operations of FTX Europe after FTX's acquisition of DAAG and has knowledge of the value that the DAAG acquisition brought to FTX.

Professionals with BDO USA, LLP:

Eylon Charles
BDO Houston Office
2929 Allen Parkway, 20th Floor
Houston, TX 77019

Matthew Goldberg
BDO Denver Office
303 E. 17th Avenue, Suite 600
Denver, CO 80203

On April 7, 2022, BDO conducted an appraisal of the value of DAAG on the date of the ultimate acquisition of DAAG by FTX and found that FTX paid fair market value for DAAG in consummating the transaction.

Jen Chan
Former CEO of FTX
Current address and phone number unknown.

Ms. Chan commission BDO to do the appraisal of DAAG after its acquisition by FTX.

Professionals with Prager Metis
14 Penn Plaza, Suite 1800
New York, NY 10122

The Certified Public Accountants with Prager Metis issued an audited statement of FTX's financials as of December 31, 2021 and have knowledge of FTX's solvency at or around the time of the disputed transactions.

Andrew G. Dietderich,
c/o Stephen Ehrenberg
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004

Andrew Dietderich is lead bankruptcy attorney for FTX et al and represented the company prior to the Chapter 11 filing. Mr. Dietderich has personal knowledge that FTX's financial condition was "rock solid" and that FTX did not use customer funds or take credit risks and did not have liquidity issues. Mr. Dietderich has personal knowledge that FTX's acquisition of DAAG did not involve a fraudulent transfer in violation of Bankruptcy Code §548. Mr. Dietderich has knowledge that FTX did not make a good-faith, legitimate attempt to sell FTX Europe to a third party after the bankruptcy petition was filed.

Darren Azman,
McDermott, Will & Emory, LLP
One Vanderbilt Avenue
New York, New York 10017
1-212-547-5615

Mr. Azman has knowledge of the assurances given by Andrew Dieterich that FTX and Alameda were financially sound and did not use customer funds or take credit risks and did not have a liquidity crisis.

Martha Lambrianou
K-DNA Financial Services Ltd
56 Griva Digeni Avenue, Anna Tower, Floor 1
CY-02, 3063 Limassol, Cyprus

Martha Lambrianou served as the CEO of K-DNA, which became affiliated with FTX Europe. Martha Lambrianou has knowledge of the value that the DAAG acquisition brought to FTX.

Marios Athinodorou
Address and phone number unknown

Marios Athinodorou served as the Executive Director of FTX Europe and has knowledge of the value that the DAAG acquisition brought to FTX.

Max Rhotert
Managing Director
Alpina Film GmbH
Wülfeler Str. 63
30539 Hanover, Germany

Max Rhotert served as the Chief Operating Officer of Crypto Lawyers, an entity affiliated with Patrick Gruhn, and served as the Chief Operating Officer of FTX Europe. Max Rhotert has knowledge of the licenses held by DAAG; the value of those licenses in the marketplace; and the value that the DAAG acquisition brought to FTX.

John Ray III
c/o Stephen Ehrenberg
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004

John Ray has knowledge of FTX's solvency at the time of the disputed transfers and the value that the DAAG acquisition brought to FTX. Mr. Ray has personal knowledge that FTX's acquisition of DAAG did not involve a fraudulent transfer in violation of Bankruptcy Code §548. Mr. Ray has knowledge that FTX did not make a good-faith, legitimate attempt to sell FTX Europe to a third party after the bankruptcy petition was filed.

Michael Kott
CM-Equity AG
Kaufingerstrasse 20
80331, Munich, Germany

Michael Kott has knowledge of the ability of DAAG to tokenize real world assets, including securities; the licenses possessed by DAAG; and the value of the licenses and business of DAAG.

Marcel Lotscher
Burghaldenstrasse 22
5400 Baden, Switzerland

Marcel Lotscher served as a regulator in Lichenstein and has knowledge of the approved tokenized stock prospectus of DAAG. After FTX's acquisition of DAAG, FTX hired Marcel Lotscher to work for FTX Europe. Marcel Lotscher has knowledge of DAAG's licensure; the value of that licensure in the marketplace; and the benefits that DAAG rendered to FTX after the acquisition.

Regulators with CySEC
P.O. Box 24996
1306 Nicosia, Cyprus

The Cyprus regulators have knowledge of DAAG's licensure; the value of that licensure in the marketplace; and the benefits that DAAG rendered to FTX after the acquisition.

Employees with the Dubai Virtual Assets Regulatory Authority
P.O. Box 9292
Dubai, UAE

The Dubai regulators have knowledge of DAAG's licensure; the value of that licensure in the marketplace; and the benefits that DAAG rendered to FTX after the acquisition.

P.C. Vriend
Head of Department of Financial Crime Supervision
DeNederlandscheBank N.V.
Postbus 98
1000 AB Amsterdam, Netherlands
+31 20 524 91 11

Ms. Vriend has knowledge of DAAG's licensure; the value of that licensure in the marketplace; and the benefits that DAAG rendered to FTX after the acquisition. DeNederlandsche Bank conducted an audit of DAAG and determined it to be in compliance with applicable laws.

Regulators with BaFin
Postfach 1253
53002 Bonn, Germany

The regulators with BaFin have knowledge of DAAG's licensure; the value of that licensure in the marketplace; and the benefits that DAAG rendered to FTX after the acquisition.

Dr. Anna L. Izzo-Wagner, LL.M. Eur.
Annerton
Rechtsanwaltsgeellschaft mbH
60323 Frankfurt a.M. Germany
+49 69 2043 689-0

Dr. Izzo-Wagner has knowledge of DAAG's regulatory compliance and licensure and the resultant value of DAAG. Annerton served as counsel for FTX in its acquisition of DAAG.

Gregory Landegger
Chief Investment Officer
The Whittemore Collection
4 International Drive, Suite 300
Rye Brook, NY 10573

Gregory Landegger served as the Chief Investment Officer of the Whittemore Collection at or around the time of FTX's investment in and acquisition of DAAG. Gregory Landegger has knowledge of discussions with DAAG pertaining to a potential transaction between the Whittemore Collection and DAAG; the value of DAAG at or around the time of FTX's acquisition of DAAG; and the market potential of DAAG.

Wei Zhou, former CFO of Binance
Current Coins.ph CEO
12F Centerpoint Building,
Julia Vargas cor Garnet St., Ortigas Center,
1605, Pasig City, Philippines

and

David Koa, head of Binance (Singapore)
Address and phone number unknown

Wei Zhou served as the Chief Financial Officer of Binance and David Koa served as the head of Binance (Singapore) at or around the time of FTX's acquisition of DAAG. Messrs. Zhou and Koa have knowledge of discussions with DAAG pertaining to a potential transaction between DAAG and Binance; the value of DAAG at or around the time of FTX's acquisition of DAAG; and the market potential of DAAG.

Various employees of Kraken
Payward Ventures, Inc.
100 Pine St, Suite 1250
Office 6, PMB A188
San Francisco, CA 94111

Kraken engaged in discussions with DAAG pertaining to a potential transaction between DAAG and Kraken. The individuals employed by Kraken have knowledge of those discussions;

the value of DAAG at or around the time of FTX's acquisition of DAAG; and the market potential of DAAG.

William Shihara
Former CEO of Bittrex
c/o Jeremy O. Bressman
Kobre & Kim LLP
800 Third Ave., 6th Floor
New York, NY 10022

William Shihara served as the CEO for Bittrex at or around the time of FTX's initial investment in DAAG. William Shihara has knowledge of discussions with DAAG pertaining to a potential transaction between DAAG and Bittrex; the value of DAAG at or around the time of FTX's investment in DAAG; and the market potential of DAAG.

Ryne Miller
Former General Counsel of FTX
Former Partner with Sullivan & Cromwell LLP
Current Managing Partner of Miller Strategic Partners LLP
New York, NY

Ryne Miller served as counsel to FTX at or around the time of FTX's investment in and acquisition of DAAG. Mr. Miller had knowledge of the European regulatory scheme for cryptocurrency exchanges and provided FTX with legal advice with respect to such regulatory schemes in connection with FTX's DAAG investment and acquisition. At or around the same time, Ryne Miller served as counsel for FTX in connection with the acquisition of Ledger X, a similarly situated company to DAAG in the United States, and Ryne Miller provided due diligence services in connection with the Ledger X transaction. Ryne Miller has knowledge of the value that a licensed company with the ability to tokenize real world assets could provide to FTX.

Sequoia Capital
2800 Sand Hill Rd
Menlo Park, CA 94025

Sequoia Capital was a significant investor in FTX. As owner of a significant equity stake in FTX, Sequoia Capital continually pushed FTX to secure the appropriate licenses and regulatory approval for its operations. Sequoia Capital has knowledge of the value that FTX's acquisition of DAAG brought to FTX in connection with regulatory and licensing legitimacy.

Mariana Gospodinova
Executive Vice President of Operations
Crypto.com
Address and phone number unknown.

Ms. Gospodinova inquired in mid-June 2023 on behalf of Crypto.com about the possible purchase of FTX Europe after FTX filed bankruptcy who inquired about a potential acquisition in mid-June.

Samuel Tracubbo
Current address and phone number unknown.

Mr. Tracubbo is a former Co-CEO of Alameda.

Arthur Thomas
Current address and phone number unknown.

Mr. Thomas has served as a director of FTX along with Bankman-Fried and Sing.

Franco Lorandi
Current address and phone number unknown.

Mr. Lorandi served as FTX Europe administrator.

2. Description of the Location of Discoverable Documents.

A. Telegram chats.

Brandon Williams principally communicated with the individuals at FTX, DAAG, and other individuals in the crypto currency space via an app known as Telegram. The chats on Telegram can be exported to HTML files and contain discoverable documents.

B. Email.

In addition to communication via Telegram, Brandon Williams communicated with individuals at FTX, DAAG, and other individuals in the crypto currency space via two email addresses: b.williams@cosimacapital.co and thelong1@protonmail.com. Both email accounts have emails retained on the cloud through Proton Mail.

C. Laptop Computer.

Brandon Williams saved certain significant documents, such as the transaction documents, DAAG's business plan, and DAAG presentation materials, locally on his laptop.

3. Damages.

Brandon Williams is not the Plaintiff and is not seeking a damages claim.

4. Insurance Agreements.

There exist no applicable insurance agreements.

/s/ Gregory L. Arbogast

Lawrence J. Gebhardt (*pro hac vice*)
Gregory L. Arbogast (No. 6255)
GEBHARDT & SMITH LLP
1000 N. West Street, Suite 1200
Wilmington, DE 19801
T: (302) 295-5038
F: (443) 957-4325
Garbogast@gebsmith.com

Attorneys for Defendant, Brandon Williams

Certificate of Service

I HEREBY CERTIFY that on this 27th day of September, 2023, I caused the foregoing Initial Rule 26(a)(1) Disclosures to be sent, via first class mail, postage pre-paid, to:

Matthew B. McGuire
Landis Rath & Cobb LLP
P.O. Box 2087
919 Market Street, Suite 1800
Wilmington, DE 19899

Andrew G. Dietderich
James L. Bromley
Brian D. Glueckstein
Alexa J. Kranzley
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004

Laura Davis Jones
Pachulski Stang Ziehl & Jones LLP
919 N. Market Street
17th Floor P.O. Box 8705
Wilmington, DE 19899-8705

Heath D. Rosenblat
Morrison Cohen LLP
Joseph T. Moldovan
Jason P. Gottlieb
909 Third Avenue, 27th Floor
New York, New York 10022

Darrell M. Daley
Samantha Neal
The Daley Law Firm
4845 Pearl East Circle, Suite 101
Boulder, Colorado 80301

/s/ Gregory L. Arbogast

Gregory L. Arbogast (Bar No. 6255)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD. and MACLAURIN
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN,
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

Adv. Pro. No. 23-50437 (JTD)

**THE DEBTORS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT PATRICK GRUHN**

Pursuant to Federal Rules of Civil Procedure 26 and 34, made applicable by
Federal Rules of Bankruptcy Procedure 7026, 7034, and 9014 (the “Bankruptcy Rules”) and the
Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local
Rules” and together with the Bankruptcy Rules, the “Rules”), the Debtors (as defined below)
submit this request for the production of documents (the “Requests”) to Defendant Patrick Gruhn
in connection with the above-captioned Adversary Proceeding. The Debtors request that the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX> [cases.ra.kroll.com]. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

documents and electronic information responsive to the Requests identified in the attached **Exhibit A** be produced to Stephen Ehrenberg, Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, counsel for the Debtors, no later than November 13, 2023.

Please take further notice that the Debtors reserve their rights under title 11 of the United States Code (the “Bankruptcy Code”), the Rules, and any applicable law regarding the subject matter of these Requests to amend, supplement, and/or modify **Exhibit A** attached hereto, or serve additional discovery requests.

Dated: October 13, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew B. McGuire

Adam G. Landis (No. 3407)
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-and-

SULLIVAN & CROMWELL LLP

Steven L. Holley (admitted *pro hac vice*)
Stephen Ehrenberg (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
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*Counsel for the Debtors
and Debtors-in-Possession*